

State of California



Fair Political Practices Commission

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June 21, 1984

Stephen Terry
MacDonald, Halstead & Laybourne
1200 Wilshire Blvd.
Los Angeles, CA 90017

Re: Our File No. A-84-158

Dear Mr. Terry:

This is in response to your letter of June 1, 1984, regarding the filing obligations of committees primarily formed to support or oppose the qualification of ballot measures under the Political Reform Act (Government Code Section 81000-91014).

Government Code Section 84200(d) requires such committees to file campaign disclosure statements:

...not later than 35 days after the deadline for filing petitions or the date of notification that the measure has either qualified or failed to qualify, whichever is earlier.

The period covered by this statement, for a ballot measure being voted upon in 1984, is January 1, 1984 through seven days prior to the date when the statement is due. (However, if the qualification effort extends into a previous calendar year, the period covered begins with the first reportable transaction.) After this statement is filed, the future campaign statement filing obligations of a committee which remains active after the qualification effort will depend on the category of committee it becomes.

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Enclosed is a copy of the Commission's 1984 Information Manual on Campaign Disclosure Provisions of the Political Reform Act, which defines and explains the filing obligations of the various categories of committees. If you need any further assistance, please let me know.

Sincerely,

Carla J. Wardlow
Political Reform Consultant

CJW:kt
Enclosures

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June 1, 1984

Ms. Carla Wardlow
Technical Division
Fair Political Practices Commission
1100 "K" Street
Sacramento, California 95814

Dear Ms. Wardlow:

This letter is a follow-up to our telephone conversation of May 30 in which we discussed filing requirements for political action committees formed primarily to oppose the qualification of an initiative measure.

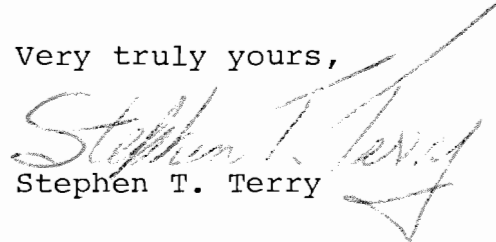
It is our understanding that such committees need file only one campaign statement for expenditures and such statement should be filed the earlier of 35 days following the deadline for filing petitions or the date of notification whether the measure has qualified. Thus when an initiative measure is not filed until the July 10 filing deadline, California Government Code §84200(d) apparently establishes an August 15 filing deadline for any campaign statements related to such initiative measure.

During our conversation you stated your tentative opinion that the Fair Political Practices Commission would concur in the above analysis. Since we now represent entities which may incur filing obligations under the above code section, we would like to obtain the Commission's informal opinion as to the above matter and its view of other filing responsibilities pertinent to this type of committee.

Ms. Carla Wardlow
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Any assistance you might provide us in this regard
will be greatly appreciated.

Very truly yours,


Stephen T. Terry

STT:rh